

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
D-1 Kavon Sampson, and
D-2 DKhari Cook

Case: 2:21-mj-30426
Assigned To : Unassigned
Assign. Date : 9/7/2021
In re: CMP: USA v SAMPSON,et al (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
(D-1 and D-2) 18 U.S.C. § 2119	Carjacking
(D-1 and D-2) 18 U.S.C. § 924(c)	Use of a firearm during and in relation to a crime of violence (carjacking)
(D-1 only) 18 U.S.C. § 922(g)(1)	Felon in possession of a firearm


This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: September 7, 2021


City and state: Detroit, Michigan



Complainant's signature

Christopher S. Pennisi, Special Agent (FBI)

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Christopher S. Pennisi, being duly sworn, depose and state as follows:

I. INTRODUCTION

1. I have been employed as a special agent of the Federal Bureau of Investigation (FBI) for sixteen years, and I am currently assigned to the Violent Crime Squad in the Detroit Division of the FBI.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2501(7), that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in 18 U.S.C. § 2516.

3. I have investigated federal violations concerning crimes of violence and firearms. I have gained experience through training and everyday work related to these types of investigations.

4. The statements contained in this affidavit are based on my experience and background as a special agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

5. This affidavit is made in support of a criminal complaint charging DKhari Cook and Kavon Sampson with taking a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119.

6. This affidavit is also made in support of a criminal complaint charging Cook and Sampson with use of a firearm in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c).

7. This affidavit is also made in support of a criminal complaint charging Sampson with felon in possession of a firearm in violation of 18 U.S.C. § 922(g).

II. SUMMARY OF THE INVESTIGATION

8. At approximately 2:00 am on September 1, 2021, victim W.E. was sitting in his white 2019 Dodge Durango while it was parked in a lot near the intersection of Brush and Lafayette in the city of Detroit.

9. A black male, later determined to be Kavon Sampson, ran up to the driver's side of W.E.'s car with a white shirt wrapped around his head. Sampson pointed a gun at W.E. and yelled "get out of the car!"

10. W.E. complied and Sampson ordered W.E. to give him the keys. W.E. told Sampson that the keys were in the car. Sampson replied "quit playing with me!" then found the keys and said "give me your glasses!"

11. W.E. took off his Cartier glasses and threw them on the ground.

Sampson picked up the glasses, got into W.E.'s Durango and drove off.

12. During the robbery, Sampson fired a shot from his pistol that ricocheted off the ground and put a hole in W.E.'s Durango.

13. Review of surveillance video of the parking lot revealed that a dark gray Chevrolet Malibu bearing Michigan license plate EKT 5684 approached the lot from Brush street and parked in an alley. The front passenger then exited the vehicle with a white shirt around his face, a black shirt, black pants, black and white shoes. The male, later identified as Sampson, was armed with a handgun at the time.

14. Review of the video confirmed victim W.E.'s account of the robbery.

15. The video also revealed that, as W.E. walked away from his car, Sampson ejected the magazine from his pistol onto the ground, picked it back up, then reloaded it into the gun before entering W.E.'s car and driving away.

16. As Sampson drove away in W.E.'s Durango, he went back through the alley and followed the dark gray Malibu away from the scene.

17. When the crime scene was processed, numerous live 9 mm pistol rounds were found at the scene along with a spent 9 mm bullet casing.

18. I have been an FBI trained firearms instructor for approximately 12 years. In my training and experience, live rounds can be ejected from a loaded

pistol magazine if it is dropped from a height to the ground and/or if the slide is pulled back as one would in an attempt to chamber a live round into the pistol without realizing that a round was already in the chamber.

19. Spent bullet casings are ejected from semi-automatic pistols such as those made by Glock after the trigger is pulled and the bullet is fired out of the gun.

20. Following the carjacking, the Malibu's license plate was entered into Michigan's Law Enforcement Information network as a felony wanted vehicle.

21. On September 2, 2021, a Berkley police officer observed a dark gray Chevrolet Malibu travelling at 45 mph in a 30 mph zone. The vehicle was stopped and DKhari Cook was identified as the driver and sole occupant of the vehicle.

22. Cook was taken into custody on suspicion of carjacking and the car searched. A loaded Glock 9 mm handgun was found under the driver's seat with a 31 round magazine that contained 19 live rounds. Cook does not possess a permit to carry a firearm concealed in such a manner.

23. On September 3, 2021, Cook was interviewed by Detroit Police officers. He admitted to driving a gray Chevrolet Malibu on September 1, 2021 and pulling into an alley at approximately 2:00 am at the request of his friend Kavon Sampson.

24. Cook and Sampson were talking about fast cars when they pulled onto Brush street. Sampson asked Cook to pull into the alley and Cook complied. Sampson looked at Cook and said “I can’t go home empty handed,” grabbed Cook’s Glock 19 that was stored in the car’s cup holder.

25. Sampson wrapped his head up, exited Cook’s Malibu and stood by a wall then ran around the corner. Moments later, the white Durango pulled through the alley. Cook waited for Sampson as Sampson carried out the armed carjacking with Cook’s 9 mm pistol.

26. Sampson followed the Durango a few streets away and they pulled up together. Cook told Sampson not to follow him because he had just robbed someone for the car. Sampson handed Cook his gun back and drove off. Cook then went home.

27. Cook identified Sampson’s home as a light blue brick front house on Fielding halfway between Joy Road and Chicago. Cook later identified 9xxx Fielding as Sampson’s home.

28. On September 3, 2021, Detroit Police Officers observed a white Dodge Durango with no license plate park across the street from 9xxx Fielding. The driver, who appeared to be Kavon Sampson, exited the car and entered the house. For approximately one hour, Sampson was observed going between 9xxx Fielding and the white Dodge Durango.

29. Sampson eventually drove the white Dodge Durango into a parking lot near the intersection of Westfield and Stahelin. Detroit Police officers attempted to arrest Sampson but he fled in the car at a high rate of speed. Sampson was ultimately taken into custody at a gas station.

30. When Sampson was taken into custody, he was wearing a black shirt, black pants.

31. On September 5, 2021, Sampson was interviewed and he admitted to having taken W.E.'s Dodge Durango at gunpoint. Sampson confirmed Cook's account of the evening, including having taken Cook's gun to commit the crime, covering his face prior to the armed carjacking, shooting the pistol during the carjacking and returning the gun to Cook following the armed carjacking.

32. Sampson explained that he snatched the victim's Cartier glasses off of W.E.'s head and that he used something he found in Cook's car to wrap around his head before conducting the carjacking.

33. In addition, Sampson explained that after he stole W.E.'s Durango, he used it in an attempt to meet women. He successfully obtained a phone number from one woman while driving the car around in downtown Detroit.

34. Finally, Sampson agreed with his interviewers that he was wearing the same clothes at the time of his arrest as he was wearing during the carjacking.

35. Glock handguns are manufactured in the state of Georgia and the country of Austria. The handgun Sampson used to carjack W.E. therefore travelled in interstate commerce.

36. Based on the VIN number assigned to W.E.'s Dodge Durango, it was manufactured in Michigan. However, W.E. is the second owner of the car. The first owner was a resident of Canada where the car was originally purchased, and as such the car was therefore "transported in interstate commerce" as recited in 18 U.S.C. § 2119.

37. On March 28, 2019, Sampson was convicted of Felony First Degree Criminal Sexual Conduct (Person under 13) and sentenced to one year in prison. Sampson is therefore a convicted felon.

III. CONCLUSION

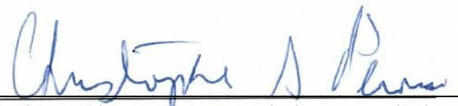
38. Based on the above information, probable cause exists that Cook and Sampson took a motor vehicle transported, shipped, or received in interstate commerce from the person or presence of another by force and violence or by intimidation and with intent to cause death or serious bodily harm in violation of 18 U.S.C. § 2119 and used and discharged a firearm during and in relation to a crime of violence (carjacking) in violation of 18 U.S.C. § 924(c).

39. In addition, Sampson, possessed a firearm knowing that he had been previously convicted of a felony offense in violation of 18 U.S.C. § 922(g).

40. In consideration of the foregoing, I respectfully request that this Court issue a complaint against Cook for violation of 18 U.S.C. §§ 2119, 924(c) and 2, and Sampson for violation of 18 U.S.C. §§ 2119, 924(c) and 922(g).

41. Further in consideration of the foregoing, I respectfully request that this Court issue arrest warrants for Cook and Sampson for these violations.

Respectfully submitted,


Christopher S. Pennisi, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my
presence and/or by reliable electronic means.


HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: September 7, 2021